
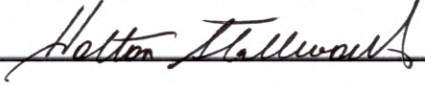




USAG Hohenfels - JMRC Hohenfels Environmental Management System



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Document Name:	Procedure for Nonconformity, Corrective Action, and Preventive Action		
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Document Owner:	Approval: 		
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1 BACKGROUND

For an environmental management system to be effective on an ongoing basis, an organization should have a systematic method for identifying actual and potential nonconformity(ies), making corrections and taking corrective and preventive action, preferably preventing problems before they occur. Situations may occur where part of the system may not function as intended or environmental performance requirements are not met. The management should ensure that corrective and preventive actions have been implemented, and that there is systematic follow-up to ensure their effectiveness.

2 PURPOSE

This procedure shall provide a system for initiating, requesting, implementing and communicating the corrective action and/or preventive action taken, and for tracking and verifying the effectiveness of the corrective or preventive action taken.

3 APPLICABILITY

This procedure applies to the activities related to preparing, implementing and documenting corrective and/or preventive actions associated with the installations processes, activities, and services, or elements of the Environmental Management System (EMS).

4 DEFINITIONS

A comprehensive list of terms and definitions used in and related to the EMS Hohenfels provides the Glossary of EMS Terms and Definitions (EMS410_002_Glossary.doc).

Corrective action – Action taken to eliminate the cause(s) of a detected nonconformity.
(See preventive action)



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EMS Coordinator – An individual, appointed by the Commander or EMS Management Representative (EMSR), who assists the EMSR in handling day-to-day operations (Examples: EMS Training Coordinator, EMS Document Control Coordinator).

EMS Implementation Cross-Functional Team (CFT) - A team appointed by the Environmental Quality Control Committee (EQCC), and led by the EMS Management Representative (EMSR) to review processes, activities and services and update the prioritized list of environmental aspects and impacts. The CFT includes representatives from the directorates, tenants, and/or activities whose operations are representative of the entire facility or whose normal operations are likely to affect the environment.

EMS Management Representative (EMSR) — An individual appointed by the Commander to be responsible for managing and overseeing the EMS implementation effort.

Environmental Management System (EMS) – A management system standard defined by the International Standards Organization (ISO) in the ISO 14001 standard as follows: Part of an organization's management system used to develop and implement its environmental policy and manage its environmental aspects.

NOTE 1: A management system is a set of interrelated elements used to establish policy and objectives and to achieve those objectives.

NOTE 2: A management system includes organizational structure, planning activities, responsibilities, practices, procedures, processes and resources.

Environmental Quality Control Committee (EQCC) – is chaired by the Garrison Commander. The EQCC acts as the board of Directors representing the Top Management for the USAGH-JMRC EMS. The EQCC is required by the Army Regulation (AR) 200-1 and should meet on a quarterly basis.

Nonconformity – non-fulfillment of a requirement (*ISO 9000:2000, 3.6.2*). A requirement may be stated in relation to the management system or in terms of environmental performance. Situations may occur where part of the system may not function as intended or environmental performance requirements are not met.

Originator - Any employee who initiates some desired action relevant to corrective or preventive action, process revision, document change, or other related activities.

Pollution Prevention Manager (P2 Manager) – An individual appointed by the Chief Environmental Division responsible for performing environmental audits concerning all media (air, water, hazardous waste and material) and to provide recommendations for risk and cost reduction.

Preventive action - Action to eliminate the cause of a potential nonconformity.

Preventive/Corrective Action Request (PCAR) — A form used to initiate a request to address an existing or potential undesirable situation, nonconformity, or other unsatisfactory condition.

Process Owner - The person responsible and accountable for improving the process in his/her charge and for implementing, documenting and communicating applicable corrective and/or preventive actions when necessary.



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5 SUPPORTING DOCUMENTS

Document ID	Title
AR 200-1	Environmental Protection and Enhancement
ISO 14001:2004	Environmental Management Systems – Specification with Guidance for Use
ISO 14004:2004	Environmental Management Systems – General Guidelines on Principles, Systems and Support Techniques
Implementers Guide	US Army Environmental Management System Implementers Guide, Latest Version 3.0, December 2005
EMS453_F01_PCAR.doc	Corrective/preventive Action Request Form (PCAR)
EMS420_000_Policy.doc	United States Army Garrison Hohenfels (USAGH) and Joint Multinational Readiness Center (JMRC) Hohenfels Joint Environmental Policy, September 2005
EMS410_001_ImplemPlan.doc	EMS Implementation Plan, US Army Garrison Hohenfels (USAGH) and Joint Multinational Readiness Center (JMRC) Hohenfels, Germany, Oct 2005
EMS432_000_Legal.doc	EMS Procedure for the Identification of Legal and Other Requirements
EMS452_000_Compliance.doc	EMS Procedure for Evaluation of Compliance
EMS455_000_Audit.doc	EMS Procedure for the Internal Audit
EMS400_000_TOC.doc	Table of Contents of the USAG Hohenfels EMS Manual

6 RESPONSIBILITIES

Non-conformance with the EMS or stated environmental controls and processes will be managed by the EQCC using the CFT and EMSR.

In a non-conformance situation, the parties responsible for addressing the non-conformance must perform several key activities to correctly assess and respond to the problem. The assessments should:

- Determine the root cause of the problem;
- Develop and document the appropriate corrective or preventive action;
- Implement, record, and communicate the corrective or preventive action; and
- Track and verify the effectiveness of corrective or preventive actions.

The EQCC will be responsible for assuring that the magnitude of the corrective action is appropriate to the magnitude of the problem and the environmental impacts encountered.



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7 PROCESS

Responsible	No.	Action
Originator	1	Report some desired corrective/preventive action request to the EMSR. The corrective and/or preventive action request should include as a minimum: <ul style="list-style-type: none">• Contact details of the originator;• Describe deficiency or non-conformance;• Root cause analysis of the required action;• Description of planned corrective and/or preventive action;• Proposed implementation date and associated costs, if applicable.
EMSR, or designated EMS Coordinator	1	When notified by an originator, review the corrective and/or preventive action request and decide: <ul style="list-style-type: none">• If the corrective and/or preventive action request is <u>appropriate</u> for further processing, proceed to Step #2.• If the corrective and/or preventive action request is <u>not appropriate</u> for further processing notify the originator as to the reason.
	2	Identify the process owner and submit a corrective/preventive action request form for process owner response.
	3	When notified that the process owner has responded to the corrective and/or preventive action request, review the root cause description, corrective or preventive action, and proposed implementation date. If <u>adequate</u> , go to step #4. If <u>not adequate</u> coordinate with the process owner for revision.
	4	If the root cause analysis, corrective and/or preventive action, and proposed implementation date are adequate, coordinate for verification of the preventive and/or corrective action at the next internal audit or through a special audit or inspection. If the nonconformity is of higher magnitude or requires quick decisions, brief the EQCC during quarterly EQCC briefs for further decision.
	5	If the EQCC, or the next internal audit, or through a special audit or inspection confirms the adequacy of the corrective and/or preventive action request, initiate implementation of the request.
	6	When notified by the process owner that implementation of the corrective and/or preventive action request is complete, the request is formally closed and documented per EMS Procedure for Documentation.



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Responsible	No.	Action
	7	Provide corrective and/or preventive action request status, effectiveness, and other pertinent information for EMS Management Reviews respectively brief the EQCC as needed.
	8	Notify the P2 Manager on the corrective/preventive action implemented, and request its audition respectively inspection for its effectiveness.
Process Owner	1	When notified of a corrective and/or preventive action request requiring a response, review the originator's description of the problem or nonconformity.
	2	Complete the corrective and/or preventive action request form and return it to the EMSR.
P2 Manager or other appropriate personnel	1	Audit or inspect the identified activities to verify the effectiveness of the preventive and/or corrective action implementation reported.
	2	If the preventive/corrective action is assessed as <u>adequate</u> , report to the EMSR that the request can be closed out.
	3	If the preventive/corrective action is assessed as <u>incomplete</u> or <u>inadequate</u> , report to the EMSR for further action.
		<i>End of activity</i>



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8 DOCUMENT REVISION SUMMARY

Revision Number	Date of Revision	Revision Summary
1.0	20 Dec 06	Erased Document ID until standardized
1.0	20 Dec 06	Date changed in footer
1.0	20 Dec 06	Changed date and version of the Implementers Guide on page 3 from "Version 2.1, March 2005" to "Version 3.0, December 2005"
1.0	20 Dec 06	Insert Preventive/Corrective Action Request Form
2.0	28 Nov 07	<ul style="list-style-type: none">- Revised filename/document ID IAW new EMS Manual format- Updated supporting documents table,- updated hyperlinks- Added and linked PCAR as Form F01
3.0	18 Feb 09	No changes
4.0	25 Aug 09	List of supporting documents has been updated